Exhibit A

1		
2		
3		
4		
5		
6		
7		
8		
9		
10		S DISTRICT COURT ALIFORNIA, SAN JOSE DIVISION
11		
12	CHASOM BROWN, et al.,	Case No. 5:20-cv-03664-LHK-SVK
13	Plaintiffs,	[PROPOSED] ORDER DENYING PLAINTIFFS' REQUEST TO DEPOSE
14 15	v.	LORRAINE TWOHILL
16	GOOGLE LLC,	Judge: Honorable Susan van Keulen
17	Defendant.	
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

Case No. 5:20-cv-03664-LHK-SVK

[PROPOSED] ORDER

Case 4:20-cv-03664-YGR Document 355-1 Filed 12/16/21 Page 2 of 5

1	[PROPOSED] ORDER	
2	Before the Court is the Parties' Joint Submission regarding their dispute over the requested	
3	apex deposition of Google employee Ms. Lorraine Twohill (the "Submission"). Having considered	
4	the parties' positions and other papers on file, the Court hereby ORDERS as follows:	
5	Plaintiffs' request to depose Ms. Lorraine Twohill is denied.	
6		
7	IT IS SO ORDERED.	
8		
9	DATED: HON. SUSAN VAN KEULEN	
10	United States Magistrate Judge	
11		
12		
13		
14		
15		
16		
17 18		
19 20		
$\begin{bmatrix} 20 \\ 21 \end{bmatrix}$		
$\begin{bmatrix} 21 \\ 22 \end{bmatrix}$		
23		
24		
25		
26		
27		
28		

1	Mark C. Mao, CA Bar No. 236165	William Christopher Carmody
2	Beko Reblitz-Richardson, CA Bar No. 238027	(admitted pro hac vice)
2	Erika Nyborg-Burch (admitted pro hac vice)	Shawn J. Rabin (admitted pro hac vice)
3	BOIES SCHILLER FLEXNER LLP	Steven M. Shepard (admitted pro hac vice)
	44 Montgomery St., 41st Floor	Alexander Frawley (admitted <i>pro hac vice</i>) SUSMAN GODFREY L.L.P.
4	San Francisco, CA 94104 Tel.: (415) 293-6800	1301 Avenue of the Americas,
5	mmao@bsfllp.com	32 nd Floor
	brichardson@bsfllp.com	New York, NY 10019
6	enyborg-burch@bsfllp.com	Tel.: (212) 336-8330
7	, , ,	bcarmody@susmangodfrey.com
/	James Lee (admitted pro hac vice)	srabin@susmangodfrey.com
8	Rossana Baeza (admitted pro hac vice)	sshepard@susmangodfrey.com
0	BOIES SCHILLER FLEXNER LLP	afrawley@susmangodfrey.com
9	100 SE 2nd St., 28th Floor	
10	Miami, FL 33131	John A. Yanchunis (admitted pro hac vice)
	Tel.: (305) 539-8400 jlee@bsfllp.com	Ryan J. McGee (admitted <i>pro hac vice</i>) MORGAN & MORGAN
11	rbaeza@bsfllp.com	201 N. Franklin Street, 7th Floor
12	10 ac2a (@03111p.com	Tampa, FL 33602
12	Amanda K. Bonn, CA Bar No. 270891	Tel.: (813) 223-5505
13	SUSMAN GODFREY L.L.P	jyanchunis@forthepeople.com
1.4	1900 Avenue of the Stars, Suite 1400	mram@forthepeople.com
14	Los Angeles, CA 90067	rmcgee@forthepeople.com
15	Tel: (310) 789-3100	16.1 17.5 G. D. W. 10100
1.6	Fax: (310) 789-3150	Michael F. Ram, CA Bar No. 104805
16	abonn@susmangodfrey.com	MORGAN & MORGAN 711 Van Ness Ave, Suite 500
17		San Francisco, CA 94102
		Tel: (415) 358-6913
18	Attorneys for Plaintiffs	mram@forthepeople.com
19		
		DISTRICT COURT
20	NORTHERN DISTRI	CT OF CALIFORNIA
21	CHASOM DROWN, WILLIAM DVATT	Case No.: 5:20-cv-03664-LHK
21	CHASOM BROWN, WILLIAM BYATT, JEREMY DAVIS, CHRISTOPHER	Case No.: 5:20-cv-03004-Lfik
22	CASTILLO, and MONIQUE TRUJILLO	
23	individually and on behalf of all similarly	[PROPOSED] ORDER GRANTING
23	situated,	PLAINTIFFS' REQUEST TO DEPOSE
24		LORRAINE TWOHILL
25	Plaintiffs,	
25		
26	VS.	
27	GOOGLE LLC,	
27	GOOGLE LLC,	
28	Defendant.	
		1

1	[PROPOSED] ORDER		
2	Before the Court is the Parties' Joint Submission regarding their dispute over the requested		
3	deposition of Google employee Lorraine Twohill (the "Submission"). Having considered the		
4	parties' positions and other papers on file, the Court hereby ORDERS as follows:		
5	Plaintiffs' request is granted. Within one week of this Order, Google will identify fo		
6	Plaintiffs the dates that Lorraine Twohill is available to be deposed. The dates Google provides to		
7	Plaintiffs will precede the close of discovery in this case.		
8			
9	IT IS SO ORDERED.		
10			
11	DATED:		
12	Honorable Susan van Keulen		
13	United States Magistrate District Judge		
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			